

United States Senate

WASHINGTON, DC 20510 - 3505

June 13, 2018

The Honorable Rhonda Schmidlein
Chairwoman
United States International Trade Commission
500 E Street, SW
Washington, D.C. 20436

Re: Citric Acid and Certain Citrate Salts from Belgium, Colombia, and Thailand,
Investigation Nos. 701-TA-581 and 731-TA-1374-1376 (Final)

Dear Chairwoman Schmidlein:

I write to express my support for U.S. citric acid producers and their workers, which are facing unfairly dumped and subsidized citric acid and certain citrate salts imports. As you prepare to make a final determination in the above referenced investigations, I urge the Commission to fully implement the Leveling the Playing Field Act (Title V of P.L. 114-27) regarding these imports' injury to the domestic industry.

U.S. citric acid producers, including the Tate & Lyle Dayton, Ohio, plant and its 80 employees, are unable to compete against dumped and subsidized imports, and they need relief. The financial status of U.S. manufacturers, including revenues, declined between 2014 and 2016. That is in large part because U.S. producers have seen a declining share of the domestic market while the market share of the subject imports have increased. According to the Commission's own preliminary report, more than half of the imported volume undersold domestically produced citric acid, and that quantity of undersold imports is increasing, which is suppressing U.S. prices. As you know, Section 503 of P.L. 114-27 expanded the definition of material injury so that U.S. producers are eligible for relief before they are forced to close their doors. I urge the Commission to consider all injury criteria included in the Leveling the Playing Field Act in its final determination.

In addition, substitutability is an important factor in this case. U.S.-produced citric acid competes against all citric acid imports in the U.S. market. This includes citric acid from all of the countries covered by the case. As the Commission has already concluded, citric acid imports from each subject countries are "reasonably fungible with the domestic like product." Therefore,

I urge the Commission to cumulate imports from all three subject countries to accurately assess the imports' threat and injury to domestic producers.

Thank you for this opportunity to provide comments in support of this industry and its workers.

Sincerely,

A handwritten signature in blue ink that reads "Sherrod Brown". The signature is written in a cursive, flowing style.

Sherrod Brown
United States Senator